

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**Lasheena Sipp-Lipscomb and Andres  
Gardin, Sr., Individually and in their own  
right and as Parents and Natural  
Guardians of A G, Jr., a Minor**

**v.**

**Einstein Physicians Pennypack Pediatrics,  
*et al.***

**Civil Action No. 2:20-cv-01926-MMB**

**PLAINTIFFS' PROPOSED INITIAL  
JURY VERDICT FORM**

Plaintiffs propose the Jury Verdict Form attached hereto. Plaintiffs reserve the right to amend and/or supplement this proposal on the basis of the evidence admitted at trial and any rulings by the Court.

JOKELSON LAW GROUP, P.C.

Date: January 13, 2023

By: s/David E. Jokelson

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**JURY VERDICT FORM**

**ST. CHRISTOPHER'S HOSPITAL FOR CHILDREN**

**Question 1:** Do you find that St. Christopher's Hospital for Children breached any of its duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 2:** If you answered Yes to Question 1, was St. Christopher's Hospital for Children's breach of its duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**HAYLEY BARTKUS**

**Question 3:** Do you find that Hayley Bartkus breached any of her duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 4:** If you answered Yes to Question 3, was Hayley Bartkus's breach of her duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**PRAMATH NATH, M.D.**

**Question 5:** Do you find that Pramath Nath, M.D. breached any of his duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 6:** If you answered Yes to Question 5, was Pramath Nath, M.D.'s breach of his duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**ERIN HASSEL, M.D.**

**Question 7:** Do you find that Erin Hassel, M.D. breached any of her duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 8:** If you answered Yes to Question 7, was Erin Hassel, M.D.'s breach of her duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**ARJUN KALYANPUR, M.D.**

**Question 9:** Do you find that Arjun Kalyanpur, M.D. breached any of his duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 10:** If you answered Yes to Question 9, was Arjun Kalyanpur, M.D.'s breach of his duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**EINSTEIN PENNYPACK PEDIATRICS**

**Question 11:** Do you find that Einstein Pennypack Pediatrics breached any of its duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 12:** If you answered Yes to Question 11, was Einstein Pennypack Pediatrics' breach of its duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**CHARLES CONCODORA, M.D.**

**Question 13:** Do you find that Charles Concodora, M.D. breached any of his duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 14:** If you answered Yes to Question 13, was Charles Concodora, M.D.'s breach of his duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

**ERIC CHO, M.D.**

**Question 15:** Do you find that Eric Cho, M.D. breached any of his duties owed to AG Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 16:** If you answered Yes to Question 15, was Eric Cho, M.D.'s breach of his duties to AG Jr. a substantial factor in causing him harm?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered **YES** to any of Questions 2, 4, 6, 8, 10, 12, 14 or 16, then continue to the next page to calculate appropriate damages. If you did **NOT** answer Yes to any of Questions 2, 4, 6, 8, 10, 12, 14 or 16, then you have reached a verdict and you are to return to the courtroom.

**Question 17:** Please state the amount of damages incurred by AG Jr.:

\$ \_\_\_\_\_

**Question 18:** Please state the amount of damages incurred by Lasheena Sipp-Lipscomb:

\$ \_\_\_\_\_

**Question 19:** Please state the amount of damages incurred by Andres Gardin, Sr.:

\$ \_\_\_\_\_

**Question 20:** For each Defendant whose breach of duties you have found were a substantial factor in causing harm to AG Jr., you must determine whether that Defendant’s conduct in connection with the care of AG Jr. was outrageous, meaning that the conduct was either malicious, wanton, willful, oppressive, and/or showed a reckless indifference to the interests of others. For each Defendant, please mark “Yes” if you find that the Defendants’ conduct was outrageous. If not, please mark “No” for that Defendant.

A. St. Christopher’s Hospital for Children Yes \_\_\_\_\_ No \_\_\_\_\_

B. Hayley Bartkus Yes \_\_\_\_\_ No \_\_\_\_\_

C. Pramath Nath, M.D. Yes \_\_\_\_\_ No \_\_\_\_\_

D. Erin Hassel, M.D. Yes \_\_\_\_\_ No \_\_\_\_\_

E. Arjun Kalyanpur, M.D. Yes \_\_\_\_\_ No \_\_\_\_\_

D. Einstein Pennypack Pediatrics Yes \_\_\_\_\_ No \_\_\_\_\_

E. Charles Concodora, M.D. Yes \_\_\_\_\_ No \_\_\_\_\_

F. Eric Cho, M.D. Yes \_\_\_\_\_ No \_\_\_\_\_

**Question 21:** For each of the Defendants for whom you had marked “Yes” in Question 20 above, please set forth the amount of punitive damages which you believe is sufficient to punish that Defendant and to deter similar acts by that Defendant. In determining the amount of punitive damages for each Defendant, you may consider factors such as 1) whether the Defendant caused physical harm, 2) whether the Defendant’s conduct evidenced indifference or a reckless disregard for the health or safety of others, 3) whether the Defendant acted with malice or trickery, and 4) whether the target of this conduct had financial vulnerability.

- A. St. Christopher’s Hospital for Children \$ \_\_\_\_\_
- B. Hayley Bartkus \$ \_\_\_\_\_
- C. Pramath Nath, M.D. \$ \_\_\_\_\_
- D. Erin Hassel, M.D. \$ \_\_\_\_\_
- E. Arjun Kalyanpur, M.D. \$ \_\_\_\_\_
- D. Einstein Pennypack Pediatrics \$ \_\_\_\_\_
- E. Charles Concodora, M.D. \$ \_\_\_\_\_
- F. Eric Cho, M.D. \$ \_\_\_\_\_

On Behalf of the Jury:

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BY THE JURY FOREPERSON

Please return to the Courtroom.



**CERTIFICATE OF SERVICE**

I, DAVID E. JOKELSON, hereby certify that on January 13, 2023, a true and correct copy of *Plaintiffs' Proposed Initial Jury Verdict Form*, was served via the Court's ECF System upon the following:

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